

Federal Defenders OF NEW YORK, INC.

Southern District
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January 11, 2021

Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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Re: United States v. Grant Grandison
21 Cr. 00001 (KMW)

MEMO ENDORSED

Dear Judge Wood:

I write to request a temporary modification of Mr. Grandison's bail conditions to allow him to travel to the Finger Lakes in upstate New York with his wife and daughter on Friday, January 15, 2020 and return to his home in the Bronx, New York on Monday, January 18, 2020. Mr. Grandison's daughter turns 16 years old on Thursday, January 14, 2020 and Mr. Grandison wishes to take her skiing for the weekend. If the Court grants his request, he will provide his travel itinerary and accommodations to his Pretrial Service's Officer ("PTSO") and abide by any conditions set by Pretrial Services and the Court.

**DENIED
-KMW**

On December 7, 2020, Mr. Grandison was released on the following conditions: a \$100,000 personal recognizance bond secured by two financially responsible persons; home detention enforced by electronic monitoring; pretrial supervision as directed; surrender travel documents and make no new applications; travel restricted to SDNY and EDNY; maintain or seek employment; and defendant not to possess a firearm.

Mr. Grandison's PTSO reports that Mr. Grandison is in full compliance with his conditions of release with no issues to report but opposes this request as it is the policy of Pretrial Services to oppose requests for bail modifications for social events or activities for clients who are on home detention in that such events contradict the intended goals of the location monitoring program. The government agrees with Pretrial Services and opposes the request.

In light of Mr. Grandison's compliance to date with his release conditions, the limited duration of this travel request, and the family oriented nature of the proposed travel, I respectfully submit that the request does not create a risk of flight nor does it endanger the community.

Therefore, I request that the Court temporarily modify Mr. Grandison's conditions of release for the purpose and duration stated above.

Respectfully submitted,

/s/ Amy Gallicchio

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Cc AUSA Alexandra Rothman
PTSO Marlon Ovalles

Defendant's request is denied, in order to serve the intended goals of the location monitoring program.

SO ORDERED.

**Dated: January 12, 2021
New York, NY**

/s/ Kimba M. Wood

**The Honorable Kimba M. Wood
United States District Judge**